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January 4, 2022

**VIA ELECTRONIC CASE FILING (CM/ECF) AND FACSIMILE**

Hon. Alvin K. Hellerstein  
U.S. District Court for the Southern District of New York  
500 Pearl Street, Room 1050  
New York, New York 10007  
Fax: (212) 805-7942

**Re: *JMB Shipping ATB 284, LLC v. Unico Commodities LLC, Inc.*, No. 1:21-cv-8907,  
Consent Request for Extension of Time**

Dear Judge Hellerstein,

We represent Plaintiff JMB Shipping ATB 284, LLC (“JMB”) in the above-referenced action, and we submit this letter, pursuant to Local Civil Rule 7.1(d) and your Honor’s Individual Rule 1.D, to request a three-week extension of time to respond to Defendant Unico Commodities LLC, Inc.’s (“Unico”) motion to dismiss (“Motion”). Unico consents to this request.

Unico filed its Motion on December 23, 2021, and JMB’s response is due on January 6, 2022. Neither party has previously requested an adjournment or extension regarding the January 6 deadline. However, Unico previously sought—with JMB’s consent—a three-week extension of time to respond to the Complaint. *See* ECF No. 7. The Court granted that request. *See* ECF No. 8.

In light of the holidays, JMB requests an equivalent three-week extension of time to respond to Unico’s Motion, from January 6 to January 27, 2022. The Court has not yet scheduled any other dates in this action.

Respectfully submitted,

/s/ Rachel Maimin

Rachel Maimin

*Counsel for Plaintiff*  
*JMB Shipping ATB 284, LLC*

cc: All counsel of record via CM/ECF



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